



**MCI Telecommunications  
Corporation**

1801 Pennsylvania Avenue N.W.  
Washington, D.C. 20006  
202 887 2082

Loretta J. Garcia  
Senior Regulatory Attorney  
Regulatory Law

EX PARTE OR LATE FILED

DOCKET FILE COPY ORIGINAL

**EX PARTE  
RECEIVED**

May 27, 1993

MAY 27 1993

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Donna R. Searcy, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

92-237

Re: Petition for Rulemaking: North American Numbering Plan

RECEIVED

MAY 27 1993

Donna R. Searcy  
May 27, 1993  
Page 2

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The toll telephone dialing format in many jurisdictions takes the form of a 1+ or 0+ prefix followed by NPA-NXX-XXXX. In order to expand the NPA code resource, the NANPA is recommending that any digit be allowed as the middle digit in NPA codes, instead of just a 1 or 0. As a result, all telephone numbers would follow the format NXX-NXX-XXXX, in which the NPA and NXX codes would be interchangeable.

Under the proposal to implement interchangeable NPAs (INPAs), the LEC would have the option of requiring that all calls within the home NPA be dialed using seven digits while all calls to another NPA would be dialed using a 1-plus-10-digit format, regardless of whether the call is toll or nontoll.

For almost forty years, telephone users have been instructed to dial "1" before toll calls. Thus, the digit 1 has become a toll indicator for nearly all telephone users. The 1 prefix is intended to inform the calling party that, when the digit 1 is dialed before the called number, additional billing charges will accompany the call, except when the call is toll free such as a 1+800 call for which the caller does not pay a toll charge.

The NANPA proposal to allow carriers to drop the 1 and move to seven digit dialing will result in customer confusion as to which calls are local and which calls are toll. Instead of eliminating the toll indicator digit, MCI urges the Commission to propose for public comment the so-called Prefix Method, in which the caller dials a toll indicator digit of 1 or 0 plus ten digits to complete any toll call, whether inside or outside the "home" NPA; the caller would dial seven digits, or ten digits without the 1+ or 0+, only when making a local call. This, MCI submits, is the preferred dialing plan alternative when interchangeable NPA codes are placed into use in 1995.

It is beyond question that eliminating the toll indicator digit after almost forty years of instruction will result in customer confusion and, ultimately, dissatisfaction. In comments filed with Bellcore in April 1992, the Ameritech Regional Regulatory Committee, which includes public utility commissions or their staffs from Indiana, Ohio, and Wisconsin, wrote:








We are concerned about the elimination of the "1" prefix as a toll indicator. Many years and much money have been spent educating the public to use a "1" prefix when placing ten digit calls, since direct distance dialing was first introduced in 1951. This discussion appears to ignore the inconvenience and "confusion" that the user

Donna R. Searcy  
May 27, 1993  
Page 3

public may be subject to yet another different dialing plan.

Joint Comments/Concerns of the Ameritech Region Commissions  
regarding the Numbering Plan Administrator's Proposal, dated April  
29, 1992, p. 6.

Some state utility commissions that have examined the issue of  
seven digit dialing have also noted the potential for customer  
confusion. The South Carolina Commission found that a LEC-



Donna R. Searcy  
May 27, 1993  
Page 4

NPAs, NANPA has failed to take into consideration the views of commissions and consumer advocates.

The logical approach, from a consumer viewpoint, would have been for the NANPA to recommend one approach to be implemented uniformly across the country. As these Petitioners note, although it is possible for individual LECs and state public utilities commissions to adopt the Prefix Method dialing plan, unless such a plan is implemented on a uniform, national basis, consumer protection cannot be ensured. Moreover, whether the toll indicator should be maintained is a public interest (consumer) issue, not a technical or network issue; this clearly is not an issue on which the Commission should give deference to NANPA's recommendation.

Thus, MCI supports these Petitioners in requesting that the Commission expeditiously institute a rulemaking proceeding to require the use of the "1+" toll indicator when interchangeable NPAs are implemented.

Respectfully Submitted,

MCI Telecommunications Corporation



Loretta J. Garcia  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 887-2082

Its Attorney

Attachment

EX PARTE OR LATE FILED  
DOCKET FILE COPY DUPLICATE

RECEIVED

GARDNER, CARTON & DOUGLAS

MAY - 6 1993

1301 K STREET, N.W.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

SUITE 900, EAST TOWER

WRITER'S DIRECT DIAL NUMBER

WASHINGTON, D.C. 20005

CHICAGO, ILLINOIS

GARDNER, CARTON & DOUGLAS

Donna R. Searcy  
May 6, 1993  
Page 2

office codes will then both be of the same "NXX" format, and the prefix '1' will, under Bellcore's plan, be needed to distinguish between these two types of codes. Under INPA, all calls within the home area code, whether local or toll, would be dialed on a 7-digit basis,<sup>1/</sup> and all calls to a different NPA, whether local or toll, would be dialed on an 11-digit (1-NPA-NXX-XXXX) basis.

In the past, the "1+" convention provided a convenient means for consumers to ascertain whether calling a particular number would entail a toll charge, and also afforded administrators of PBX systems a simple and consistent algorithm for implementing toll restriction in their systems. Under INPA, consumers will not be able to determine the charging status of a particular call unless they look up the code in the local telephone directory.<sup>2/</sup> Similarly, a PBX will not be able to identify toll calls unless it has been modified to perform this type of screening function and maintains an up-to-date table of local (or toll) central office codes. Neither of these will happen without cost and administrative burden to the PBX manager. AT&T has recently quoted prices for modifying its PBX products at between a few hundred dollars to well over \$10,000, and this does not include the costs of maintaining code tables on an ongoing basis over time. A recent study conducted by the British Office of Telecommunications put the cost of premises equipment modifications to accommodate the forthcoming UK numbering change at nearly £200-million, which translates into more than \$1-billion after accounting for the size differences of the US and the UK.

Moreover, without the digit "1" as a toll identifier, consumers are not likely to know that they could pick a carrier other than the resident LEC to handle intraLATA toll traffic in LATAs in which toll competition has been authorized. As a consequence, intraLATA long distance competition will be adversely affected by Bellcore's INPA plan.

---

<sup>1/</sup> An alternative arrangement, being considered in some states, would require HNPA toll calls to be dialed on an 11-digit basis, using the prefix '1' plus the home area code plus the 7-digit telephone number.

<sup>2/</sup> That, of course, assumes that the code will be found there. Codes added after the current directory was printed will not appear until the following year's edition, assuming that all directories are printed annually.

Donna R. Searcy  
May 6, 1993  
Page 3

The Ad Hoc Telecommunications Users Committee has devised an alternative to Bellcore's plan, which was presented to the FCC in the Committee's Comments in CC Docket No. 92-237, that would avoid nearly all of these costs and ongoing burdens. Under the plan described above, which the undersigned parties endorse, it will be possible to retain the 1+ prefix on all toll calls and to exclude it on all local calls, even those which cross an NPA boundary. The present dialing pattern currently in use in the Washington, DC metropolitan area demonstrates the feasibility of such an approach. The key to this arrangement is not to assign as CO codes the same sequence of digits associated with either the home or any adjacent NPA codes for which local rate treatment applies, and to require that all toll calls placed within the Home NPA be dialed on an 11-digit (1-HNPA-NXX-XXXX) basis.<sup>3/</sup> Thus, as long as the 202, 703, and 301 codes are never used as CO codes within the Washington, DC metropolitan area, stored program control central offices can readily identify calls to these NPAs as local inter-NPA calls without the need for a prefix '1'.<sup>4/</sup> While the C&P Telephone Company has adopted this dialing pattern for the present time, it is not a recognized approach within the Bellcore NANP standard, and may well be abandoned by C&P in its implementation of INPA. Yet because decisions as to the efficacy of any particular local dialing patterns are generally addressed solely at the state PUC level, the potential usefulness of this approach, which would permit full and unambiguous retention of

---

<sup>3/</sup> The use of a nearby NPA code as a CO code is expressly discouraged so as to minimize the incidence of mis-dialed calls. See, Bellcore, BOC Notes on the LEC Networks - 1990, p. 3.8. Nevertheless, the Committee has identified a total of six (6) situations out of the more than 48,000 NPA-NXX codes presently in use in which a home or adjacent NPA is used as a CO code in that NPA. These are confined to three New York City codes (212-516, 718-718 and 718-917) and three Los Angeles codes (213-714, 818-818, and 818-909). In any event, these few codes can be reclaimed, and the impact upon the users of these six relatively new CO codes would be minimal by comparison with the benefit for all NANP users that would result from a uniform and coordinated toll/local identifier.

<sup>4/</sup> Thus, when a Washington, DC customer dials 408 without a 1+ prefix, the central office will interpret that as a local CO code. But when the customer dials 703 without a 1+ prefix, the central office will interpret that code as the NPA for northern Virginia.

GARDNER, CARTON & DOUGLAS

Donna R. Searcy  
May 6, 1993  
Page 4

the 1+ prefix as an exclusive toll access digit, has never been formally considered as part of a national standard.

The Ad Hoc Committee plan would not only alleviate many of the operational concerns engendered by the implementation of interchangeable NPA codes, it would actually simplify the existing PBX administrative function. Under the present 1+NPA requirement that exists even for local calls in a number of areas (e.g., New York, Chicago, Los Angeles), the PBX must screen for local '1-NPA-NXX' sequences and pass such calls even where the prefix '1' had been dialed. Under the Ad Hoc Committee plan, toll calls would always require a prefix '1', and local calls would never require a prefix '1', even where the call is directed to a different NPA. The following table summarizes all possible combinations of local and toll, intra- and inter-NPA call dialing patterns under this scheme:

Local call, home NPA	7 digits	NXX-XXXX
Local call, foreign NPA	10 digits	FNPA-NXX-XXXX
Toll call, home NPA	11 digits	1-HNPA-NXX-XXXX
Toll call, foreign NPA	11 digits	1-FNPA-NXX-XXXX

where HNPA = 3-digit code for Home NPA;  
FNPA = 3-digit code for Foreign NPA.

It is, of course, possible for individual LECs and state PUCs to adopt this type of dialing pattern, but unless it is implemented uniformly and nationally the larger consumer protection and end user system management concerns will go unaddressed.

Bellcore's plan will impose large and, for the most part, unnecessary costs and administrative burdens upon business telephone users and cause individuals to incur unintended toll



**GARDNER, CARTON & DOUGLAS**


Donna R. Searcy  
May 6, 1993  
Page 5

Telecommunications Users Committee has urged the Commission to begin.<sup>5/</sup>

Respectfully submitted,

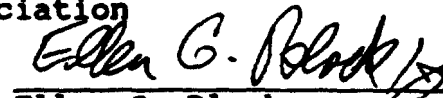
Ad Hoc Telecommunications Users  
Committee

By:

  
James S. Blaszk  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900, East Tower  
Washington, D.C. 20005  
(202) 408-7100

California Bankers Clearing House  
Association, MasterCard International,  
Incorporated, New York Clearing House  
Association, Securities Industry  
Association

By:

  
Ellen G. Block  
Levine, Lagapa & Block  
1200 19th Street, N.W.  
Suite 602  
Washington, D.C. 20036  
(202) 223-4980

---

<sup>5/</sup> Ad Hoc Telecommunications Users Committee, Initial Comments (CC Docket No. 92-237) at 18-27, 37-38; Reply Comments (CC Docket No. 92-237) at 6-8, 15.

GARDNER, CARTON & DOUGLAS

Donna R. Searcy  
May 6, 1993  
Page 6

Consumer Federation of America

By: Bradley Stillman /SS  
Bradley Stillman  
Legislative Counsel

1424 16th Street, N.W.  
Suite 604  
Washington, D.C. 20036  
(202) 387-6121

County of Los Angeles

By: William G. Irving /SS  
William G. Irving  
14585 Chimney Rock Road  
Paso Robles, California 93446  
(805) 238-3113

Information Technology Association of  
America

By: Joseph P. Markoski /SS  
Joseph P. Markoski  
Squires, Sanders & Dempsey  
1201 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
(202) 626-6634

International Communications Association

GARDNER, CARTON & DOUGLAS

Donna R. Searcy  
May 6, 1993  
Page 7

New York Consumer Protection Board<sup>6/</sup>

By: Richard M. Kessel  
Richard M. Kessel  
Executive Director

Joel Blau  
Director, Utility Intervention

Philip S. Shapiro  
Intervenor Attorney

99 Washington Avenue  
Suite 1020  
Albany, New York 12210-2891  
(518) 474-5015

Tele-Communications Association

By: R. Michael Senkowski  
R. Michael Senkowski  
Jeffrey S. Linder  
Wiley, Rein & Fielding  
1776 K Street, N.W.  
Washington, D.C. 20006  
(202) 429-7000

---

<sup>6/</sup> The New York State Consumer Protection Board is an agency of the State of New York authorized and empowered to represent the interests of New York's consumers before, inter alia, Federal administrative and regulatory agencies. New York Executive Law §553 (3) (d).